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EIGHTH AFFIRMATIVE DEFENSE

The claims of Plaintiffs and/or the putative class members may be barred, in whole or in part, by the doctrine of release.

NINTH AFFIRMATIVE DEFENSE

The claims of Plaintiffs and/or the putative class members may be barred, in whole or in part, by the doctrines of set-off or recoupment.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs received actual notice of all material and pertinent information regarding the repossession and sale of their vehicle.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs have not suffered any cognizable damages by reason of any actions of Defendant.

TWELFTH AFFIRMATIVE DEFENSE

To the extent Plaintiffs have suffered any damages by reason of any actions of Defendant, Plaintiffs may have failed to mitigate their damages.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims may be preempted, in whole or in part, by federal law.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims do not satisfy the requirements of Federal Rule of Civil Procedure 23 to proceed by means of a class action.

